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BY ECF

The Honorable Lewis J. Liman
U.S. District Court, Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: Rimu Capital Ltd. v. Ader et al., No. 23-CV-05065 (LJL)

Dear Judge Liman:

I write on behalf of Defendants under Your Honor's Individual Practices ¶ 1(D), to move for a brief extension of the deadline for Defendants to move for a protective order against the production of certain documents in a subpoena upon the Milbank firm, from September 17 to September 18, 2023. (Sept. 12, 2023 Minute Entry.) Plaintiff consents to this extension. This is Defendants' first request for an extension of this deadline. The parties' next scheduled conference with the Court is a post-discovery conference on August 8, 2024 at 3 p.m.

The reason for the extension request is that Defense counsel will be unavailable on Sunday September 17, 2023, to observe the second day of Rosh Hashanah.

Thank you for your consideration.

Respectfully submitted,

/s/ Samuel J. Lieberman
Samuel J. Lieberman

BY ECF: All counsel of record